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Attorneys for Defendants Forever 21, Inc., Forever 21 Retail, Inc., Forever 21 Logistics, LLC, Do Won Chang and Jin Sook Chang

## UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

ANNA SUI CORP.,

07 Civ. 3235 (TPG)(JCF)

Plaintiff,

-V-

FOREVER 21, INC., FOREVER 21 RETAIL, : INC., FOREVER 21 LOGISTICS, LLC, : DO WON CHANG, JIN SOOK CHANG, : GADZOOKS, INC., GERALD P. SZCZEPANSKI : and JOHN DOES 1 to 20, :

Defendants.

NOTICE OF DEFENDANTS
DO WON CHANG'S AND JIN SOOK CHANG'S MOTION TO
DISMISS PLAINTIFF'S FIRST AMENDED COMPLAINT FOR LACK
OF PERSONAL JURISDICTION PURSUANT TO FED. R. CIV. P. 12(b)(2)

PLEASE TAKE NOTICE that upon the accompanying Declaration of Do Won Chang,
Declaration of Jin Sook Chang and Memorandum of Law, Defendants Do Won Chang ("DWC")
and Jin Sook Chang ("JSC") (collectively "the Chang Defendants") by their undersigned counsel

hereby move this Court for an Order pursuant to Federal Rule of Civil Procedure 12(b)(2) dismissing Plaintiff Anna Sui Corp's ("Plaintiff") First Amended Complaint against the Chang Defendants for lack of personal jurisdiction and for such other relief as this court deems just and proper.

Dated: December 14, 2007 Respectfully submitted,

By: s/Robert L. Powley

Robert L. Powley (RP 7674) James M. Gibson (JG 9234) David J. Lorenz (DL 3072)

Attorneys for Defendants Forever 21, Inc., Forever 21 Retail Inc., Forever 21 Logistics, LLC, Do Won Chang and Jin Sook Chang

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Julio M. Lopez

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of DEFENDANTS DO WON CHANG'S AND JIN SOOK CHANG'S MOTION TO DISMISS PLAINTIFF'S FIRST AMENDED COMPLAINT FOR LACK OF PERSONAL JURISDICTION PURSUANT TO FED. R. CIV. P. 12(b)(2) was served upon counsel for Plaintiff by ECF and First-Class Mail, postage prepaid, on this 14th day of December 2007, addressed as follows:

> Marya Lenn Yee, Esq. Amy C. Opp, Esq. DONOVAN & YEE LLP The Soho Building 110 Greene Street, Suite 700 New York, New York 10012 (212) 226-7700